

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Annual Assessment of the Status of
Competition in the Market for the
Delivery of Video Programming

MB Docket No. 12-203

**REPLY COMMENTS OF
Lowell Telecommunications Corporation**

Lowell Telecommunications Corporation (LTC) submits these reply comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming” and the opening comments filed in this proceeding.

LTC is an independent, non-profit 501 (c)(3) organization that runs the public and government access cable stations and a community media center for Lowell, Massachusetts. LTC fosters open access to information and communication technologies for the distribution of free ideas, community development and personal empowerment.

1. Comcast provides three cable channels for use by the City of Lowell, and managed by LTC. One channel airs English language public programming. A second airs foreign language public programming – with an incredibly diverse community, LTC users produce hundreds of hours of foreign language programming each month. A third channel is available for government related programming.
2. These channels are available to all Lowell cable subscribers. If residents only have analog television sets, they require a digital converter box to receive this basic service.

3. Our channels are located at 8, 95 and 99. Our government access station was recently moved from channel 10 to 99 to accommodate a new home shopping channel. While we did our best to publicize this move with no budget allowance for the marketing campaign, this change was still confusing to our local viewers and makes access to public information about our local government difficult to find.
4. Unfortunately our cable provider does not allow for distribution of our programming schedule on the system's on-screen program guide. Residents must navigate to our website to view our programming schedule, though we can provide all necessary data required for inclusion on an on-screen program guide.
5. We are not in an AT&T U-Verse community.
6. Though we have inquired about upgrading our broadcast signal to HD, and have the equipment to do so, we have been told by our cable provider that installing the equipment to transmit this signal would be too costly a proposition and we will not be able to do so.
7. Our viewers have requested time and again that we make our content available on-demand online and available for viewing with smartphones. Again, we have access to the technology to do so, but have been told by our cable provide that we cannot.
8. PEG TV in Lowell provides an important service to the community. We are charged with developing, production, post-production, distribution, and promotion of local programming serving the 100,000+ community at large as well as specific niche markets in our community. We also train local residents, business owners and students on how to crete their own content and provide production support to these parties. At the same time we must maintain up to date equipment needed to do so, with an ever diminishing budget. With the advent of social media, and the constant news steam to which people have

become accustomed, access to the type of hyper-local and immediate programming produced at LTC is in higher demand than ever, and we simply cannot keep up with the demand. We have over 500 active members on our production team, and new people joining every day who wish to create media for their community. Over 50 local non-profits and government offices in our City have endless communications needs that we help them meet. In addition, we provide an outlet for discourse for many of the City's most underserved populations including elderly, youth, the disabled community, English language learners, and more. We also routinely feature notable community figures in our programming such as government officials, local business owners, musicians, religious leaders, philanthropists, and others who would not be considered underserved. Yet we provide a unique alternative for all parties to communicate with a larger audience.

Without LTC these groups would lose access to the primary medium they use to reach out to their constituents.

9. In closing, PEG media is a meaningful and important part of our community in Lowell and plays such a role in many communities around the country. We are a common ground for people from all walks of life to communicate via cable technology. We manage a far more complex workflow than most MVPDs and do it all on a much smaller budget. We provide access to unique, local, up to the minute, and critical information for local residents to learn about their community and government resources. We ask the Commission to take steps to preserve community media and prevent discriminatory practices to marginalize and effectively eliminate the important service that PEG stations provide to local consumers. Access to more up to date technologies, and ability to work cooperatively with our cable providers would be in the best interests of our consumers.

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